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Counsel for Highland Capital Management, L.P.

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

HIGHLAND CAPITAL MANAGEMENT, L.P.

8

Plaintiff,

3

vs.

8

JAMES DONDERO, NANCY DONDERO, AND THE
DUGABOY INVESTMENT TRUST,

10

Defendants

§
§
§ Case No. 3:21-cv-00881-X

HIGHLAND CAPITAL MANAGEMENT, L.P.,

§

Adv. Proc. No. 21-03004-sj

vs.

HIGHLAND CAPITAL MANAGEMENT FUND
ADVISORS, L.P.,

Case No. 3:21-cv-00881-X

Defendant.

HIGHLAND CAPITAL MANAGEMENT, L.P.,

88

Plaintiff,

Adv. Proc. No. 21-03005-sj

VS.

NEXPOINT ADVISORS, L.P., JAMES
DONDERO, NANCY DONDERO, AND
THE DUGABOY INVESTMENT TRUST.

Case No. 3:21-cv-00881-X

Defendants.

HIGHLAND CAPITAL MANAGEMENT, L.P.,

88

Plaintiff,

Adv. Proc. No. 21-03006-sgi

VS.

HIGHLAND CAPITAL MANAGEMENT
SERVICES, INC., JAMES DONDERO,
NANCY DONDERO, AND THE DUGABOY
INVESTMENT TRUST,

Case No. 3:21-cv-00881-X

Defendants.

DOCS NY:46522.1 36027/003

HIGHLAND CAPITAL MANAGEMENT, L.P., §
§
§ Plaintiff, § Adv. Proc. No. 21-03007-sgj
§
§ vs. § Case No. 3:21-cv-00881-X
§
§ HCRE PARTNERS, LLC (n/k/a NexPoint §
Real Estate Partners, LLC), JAMES §
DONDERO, NANCY DONDERO, AND §
THE DUGABOY INVESTMENT TRUST, §
§
§ Defendants. §
§

**HIGHLAND CAPITAL MANAGEMENT, L.P.’S RESPONSE TO DEFENDANTS’
OBJECTIONS TO PLAINTIFF’S PROPOSED FORM OF JUDGMENT AWARDING
ATTORNEY’S FEES AND COSTS**

Highland Capital Management, L.P., the reorganized debtor and the plaintiff in the above-captioned adversary proceedings (“Highland” or “Plaintiff”), hereby files this response (the “Response”) to *Defendants’ Objections to Plaintiff’s Proposed Form of Judgment Awarding Attorney’s Fees and Costs* (the “Objection”).¹ Highland fully incorporates by reference its contemporaneously filed brief (the “Brief”) in response to the Objection and would show unto the Court as follows:

RELIEF REQUESTED²

1. By this Response, Highland respectfully requests that the Court enter an order overruling the Objection.
2. Pursuant to Rules 7.1(d) and (h) of the *Local Civil Rules of the United States*

¹ The defendants (collectively, the “Defendants”) filed identical copies of their Objection in each of the Adversary Proceedings. See Adv. Pro. No. 21-03003-sgj, Docket No. 204; Adv. Pro. No. 21-03004-sgj, Docket No. 173; Adv. Pro. No. 21-03005-sgj, Docket No. 221; Adv. Pro. No. 21-03006-sgj, Docket No. 226; Adv. Pro. No. 21-03007-sgj, Docket No. 221.

² Capitalized terms shall have the meanings ascribed to them in the Brief.

District Court for the Northern District of Texas, Dallas Division (the “Local Rules”), the Brief is being filed contemporaneously with this Response and is incorporated by reference.

PRAYER

WHEREFORE, Highland respectfully requests that the Court (i) overrule the Objection, and (ii) grant such other and further relief as the Court deems just and proper.

Dated: September 27, 2022

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